

CONTRACTION CONTRACT ROOM

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Robert T. Bennett Chairman

Martha C. Moore Vice-Chairman

> Federal Election Commission 999 "E" Street NW Washington, DC 20463 Attn: Melissa Hurd, Reports Analyst

April 1, 1997

RE:

Ohio Republican State Central and Executive Committee

30 Day Post-General Report (10-17-96-11/25/96)

Dear Ms. Hurd:

This letter is in response to the Commission's request for additional information regarding the above referenced reporting period. An itemization follows:

Schedule A of your report discloses contributions which appear to exceed the limits set for in the Act.

Agree the contributions from the Committee for Agric Pol Ed exceed the limit by \$500. These funds have been reattributed to our state funds, copy of check issued is attached as documentation. This trunsfer will be reflected on our 1/1/97 - 6/30/97 report.

Agree the contributions from Friends of John Boehner exceed the limit by \$7,500. These funds have been reattributed to our state funds, copy of check issued is attached as documentation. Also, see new Schedule A which is included with this response. This transfer will be reflected on our 1/1/97 - 6/30/97 report.

Please clarify all expenditures for "get-out-the-vote".

All expenditures for "get-out-to-vote" activities were for exempt activities. The generic message contained therein did not reference specific candidates and, therefore, did not trigger allocation to a candidate or candidates.

Please clarify all expenditures for Party Building Media on Schedule H4.

All expenditures for Party Building Media were for generic party
activities and did not reference specific federal candidates and,
therefore, no allocation to candidates was required.

Schedule A supporting line 12 discloses a transfer-in from the Republican National Committee. Schedule B Line 21(b) reflects payments for various exempt activities. Please clarify the nature of the transfers-in and payments for exempt activities.

From time to time the Republican National Committee transferred funds to the Ohio Republican State Central and Executive Committee. None of these funds were used for volunteer, exempt activities nor were they used for candidate specific programs.

You have received a contribution from United Liberty Life Partnership. Generally these contributions are to be attributed to each person based on their percentage ownership in the firm.

United Liberty Life operates as a partnership with 26 equal partners. The per-partner contribution would be \$192.30 which is below the \$200 reportable limit therefore, the per partner attribution was not reported.

You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year.

For every entry supporting Line 11(a)(i), we have indicated if the person was retired, employed or if we had requested the employment information. Attached is a sample copy of our "best efforts" request. If contributor information was not obtained with our first request, the caging department of our finance division attempted phone contact to obtain the information.

Please clarify the contributor of the \$1,000 receipt from Benesch Friedlander Copland Aro on page 2, item C for Schedule A supporting line 11(a).

Benesch Friedlander Copland, etc. is a law firm operating as a partnership with 65 partners. Allocating the \$1,000 contribution results in a per-partner contribution of \$15.38 which is below the \$200 reporting limit.

Schedule B discloses a loan in the amount of \$10,000 made to Lucas Cuty Republican Party. The repayments must be comprised of permissible funds.

Agree and noted for future reporting.

Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Candidate Committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed

Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

Thank you, noted for future filings.

An anonymous contribution is limited to \$50. Any amount in excess of \$50 may not be used for federal purposes. Please make note of this limitation when accepting future contributions.

Thank you, noted for accepting future anonymous contributions.

Should you have further questions or concerns, please contact us.

Jeni Matitus ....

Sincerely,

Terri Matthews

Controller

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Signature	Amt. \$	
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## THE RIFTH THIRD BANK OF COLUMBUS. COLUMBUS, OHIO

25-216440

3/31/97

PAY TO THE ORDER OF .

FIFTH THIRD BANK

\*\*11,500,00

**ODLLARS** 

FIFTH THIRD BANK
OHIO REPUBLICAN PARTY
STATE ACCOUNT# 759-21007

MEMO

Resttribution of conditions from 1996

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OHIO REPUBLICAN PARTY/FEDERAL ACCOUNT

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## Federal Election Commission

## ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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d	First Class Mail	POSTMARKED 4-1-97
	Registered/Certified Mail	POSTMARKED
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	Received from the Senate Office of Public Records	DATE OF RECEIPT
	Other (Specify):	POSTMARKED
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